

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAROD STYLES, <i>et al.</i>	)	
	)	
Plaintiffs,	)	Case Nos. 18 C 1049;
	)	18 C 1053; 18 C 1062;
v.	)	and 18 C 1068
	)	
CITY OF CHICAGO, <i>et al.</i>	)	Hon. Martha M. Pacold
	)	
Defendants.	)	
	)	

**PLAINTIFFS' JOINT MOTION FOR  
AN EXTENSION OF TIME TO AMEND PLEADINGS**

Plaintiffs Larod Styles, LaShawn Ezell, Charles Johnson, and Troshawn McCoy, by their respective attorneys, respectfully request an extension of 90 days to amend their pleadings, up to and including January 27, 2020, stating as follows:

1. On June 13, 2018, the Court granted Defendants' motion for an extension of time and extended the MIDPP deadline to August 31, 2018. Doc. 53. Pursuant to the Court's revised discovery schedule, Plaintiffs' deadline to amend their pleadings was November 29, 2018. *See* Doc 39.

2. On November 29, 2018, Plaintiffs requested a 90-day extension to amend pleadings. Doc. 100. The Court granted Plaintiffs' motion and set the deadline to amend pleadings for February 27, 2019. Doc. 102.

3. On February 22, 2019, Plaintiffs requested a 60-day extension to amend pleadings. Doc. 105. The Court granted Plaintiffs' motion and set the deadline to amend pleadings for April 29, 2019. Doc. 107.

4. On April 29, 2019, Plaintiffs requested a 90-day extension to amend pleadings. Doc. 110. The Court granted Plaintiffs' motion and set the deadline to amend pleadings for July 29, 2019. Doc. 112.

5. July 29, 2019, Plaintiffs requested a 90-day extension to amend pleadings. Doc. 126. The Court granted Plaintiffs' motion, and the deadline to amend pleadings is now October 28, 2019. Doc. 128.

6. For the following reasons, Plaintiffs respectfully request that this Court extend the deadline to amend pleadings by 90 days.

7. From January through July 2019, the parties were engaged in document discovery.

8. The parties have worked cooperatively to schedule depositions for both parties and third-party witnesses. Depositions began only recently, and several depositions initially scheduled for September and October had to be rescheduled for a later date and remain pending. Plaintiffs have not yet taken the Defendant officers' depositions.

9. Plaintiffs are unable to determine whether it will be necessary to amend their pleadings until depositions of the Defendant officers have been able to proceed. Accordingly, Plaintiffs respectfully request an extension to January 27, 2020, to permit them to depose the Defendant officers and amend their pleadings.

10. Plaintiffs' counsel contacted counsel for the Defendants to request their position, but Defendants' counsel has not responded as of the time of this filing.

11. This motion is brought in good faith and not for the purpose of delay. No party will suffer prejudice if this motion is granted.

WHEREFORE, Plaintiffs Larod Styles, LaShawn Ezell, Charles Johnson, and Troshawn

McCoy respectfully request that the Court grant their request for a 90-day extension of time to amend pleadings, up to and including January 27, 2020.

Respectfully submitted,

/s/ Jill M. Hutchison  
*One of Plaintiffs' Attorneys*

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**CERTIFICATE OF SERVICE**

I, Jill M. Hutchison, an attorney, certify that on October 28, 2019, I caused the foregoing Plaintiffs' Joint Motion for an Extension of Time to Amend Pleadings to be filed using the Court's CM/ECF electronic filing system and thus effected service on all counsel of record.

/s/ Jill M. Hutchison

One of Plaintiffs' Attorneys